

Message

From: Thompson, Lisa [Thompson.Lisa@epa.gov]
Sent: 2/12/2018 5:26:47 PM
To: North, Alexis [North.Alexis@epa.gov]
Subject: RE: Shut-in well question

That's interesting! I'm glad you found that!

From: North, Alexis
Sent: Monday, February 12, 2018 12:09 PM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>
Subject: RE: Shut-in well question

I did find this one response in the FAQs- through December 2016 doc, page 38-39 on Oil & Gas Workgroup Sharepoint. I highlighted the weird bit that doesn't really answer the question that I tried to answer with my reference to NSPS JJJJ.

Q: Subpart OOOOa covers specific sources that were not covered in Subpart OOOO. The updated standards regulate VOCs, GHGs, and specifically methane from all sources, including low production wells.

Based on the language of Subpart OOOOa and the preamble, it appears that all production sites and facilities are included in the combined rules of Subpart OOOO, Subpart OOOOa, and other Part 60 rules. Oil production from the well, extending to the transmission pipeline, is referenced repeatedly in the preamble and referred specifically in Subpart OOOOa, including §60.5365a and §60.5435a.

The preamble to Subpart OOOOa discusses an exemption for well sites that contain only one or more wellheads from the affected facilities subject to the fugitive emissions monitoring provisions of §60.5397a (81 FR 35861).

The definition of a wellhead is as follows:

Wellhead means the piping, casing, tubing and connected valves protruding above the earth's surface for an oil and/or natural gas well. The wellhead ends where the flow line connects to a wellhead valve. The wellhead does not include other equipment at the well site except for any conveyance through which gas is vented to the atmosphere. (§60.5430a)

Therefore, if the definitions are viewed with the exceptions, it appears that not only fractured and refractured wells are included, but crude oil wells would also be covered under Subpart OOOOa (see §60.5430a). Thus, it appears that all oil and gas production wells are subject to the fugitive emissions monitoring provisions of §60.5397a, the exception being a well site with only one or more wellheads as defined above. Presumably, a well that is shut-in would not be subject to §60.5397a, but any well that is producing gas or oil, or has not been shut-in (i.e., a well with a pump jack that is or is not running) would be subject to §60.5397a.

A: First of all, Subpart OOOO does not have a fugitive emissions program for new, modified, reconstructed sources between the date range in the rule (August 23, 2011 to September 18, 2015). Subpart OOOOa fugitive emissions monitoring requirements under §60.5397a for well sites includes both oil and gas well sites for new, modified, reconstructed sources after September 23, 2015. For Subpart OOOOa, well sites include production and injection based on the definition (see §60.5430a). Also for purposes of the fugitives program, well site also includes a separate tank battery. Fugitive emissions monitoring requirements at §60.5397a are not applicable to well sites consisting only of one or more wellheads (e.g., Christmas tree) (see §60.5365a(i)(2)). Regarding a

well that is shut in, if it triggers Subpart OOOOa at some point in time, then stops production at a later point, the rule doesn't provide a mechanism to cease the monitoring program after shut in.

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From: Thompson, Lisa
Sent: Monday, February 12, 2018 8:48 AM
To: North, Alexis <North.Alexis@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: Shut-in well question

I only asked about delay of repair because I think that's the only time in the rule we talk about well shut-ins. I'm not totally sure what this is about, but let's just see if Karen has follow up questions. I'll also try to circle with her this afternoon.

From: North, Alexis
Sent: Monday, February 12, 2018 10:37 AM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: Shut-in well question

Karen Marsh called and asked if I had "any guidance on shut-in facilities". She didn't mention delay of repair or anything else. That isn't very helpful, I know.

I'm answering it as if a company fracked a well, it started producing and then shut in the well in before it's due for either the initial survey or subsequent semiannual surveys per 60.5397a.

Does that help??

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Subject: RE: Shut-in well question

Can you provide a bit more context? I imagine this has to do with the delay of repair requirement, right?

From: North, Alexis
Sent: Monday, February 12, 2018 10:23 AM

To: Thompson, Lisa <Thompson.Lisa@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>

Subject: FW: Shut-in well question

Karen Marsh is asking me about how we might handle a “shut-in” well with LDAR applicability, see my answer to her below.

Please make sure I’m not going totally rogue here.

Thanks,

Alex

Hi Karen,

My knee jerk answer is based in my daily interactions with NSPS JJJ for RICE engines. There is clear language in that reg that I routinely cite to:

60.4244 (b) You may not conduct performance tests during periods of startup, shutdown, or malfunction, as specified in §60.8(c). If your stationary SI internal combustion engine is non-operational, you do not need to startup the engine solely to conduct a performance test; however, you must conduct the performance test immediately upon startup of the engine.

While this exact language does not exist in NSPS OOOOa, the SSM language does so I'd be inclined to say “immediately upon startup” of a well site, get your IR inspection done that was missed during shut-in.

I'm going to run this theory by a few of my fellow NSPS OOOOa staff but wanted to get something to you ASAP.

Thanks and I'll follow up next week,

Alex

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